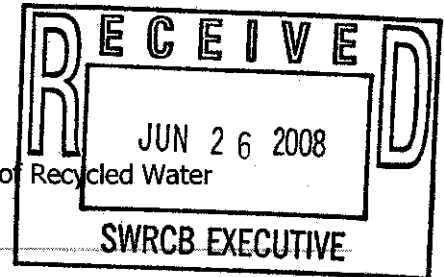


## **commentletters - Comments on Statewide General Permit for Landscape Irrigation Uses of Recycled Water**

**From:** Paul Johnston  
**To:** commentletters@waterboards.ca.gov  
**Date:** Thursday, June 26, 2008 9:10 AM  
**Subject:** Comments on Statewide General Permit for Landscape Irrigation Uses of Recycled Water  
**CC:** Claudia Villacorta



The following are offered for consideration and discussion purposes:

1. Landscape irrigation use. Title 22 allows recycled water to be used for landscape irrigation. The level of treatment, i.e., secondary or tertiary, is dependent upon restricted access and use. The General Permit should be clear on this issue.
2. Fee schedule. A fee schedule is allowed to reimburse the costs incurred to implement this requirement. Fees are currently not charged by the regional water boards for waste discharge permits involving recycled water. This has acted as an incentive. Any new fee schedule established by the State Water Board should take this into account and be reasonable.
3. Recycled water use. The use of recycled water requires oversight and involves various issues to ensure its safe use and address public health issues. Producers are generally required to draft and implement recycled water regulation specifying its use, oversight responsibilities, sign/tag requirements, hours of use, onsite retrofit/ conversion requirements, etc. Site owners identify, by name and phone number, individuals responsible for overseeing the proper use of recycled water. These requirements are in place to ensure public safety, recycled water is properly used as intended, and to prevent cross-contamination with potable water sources. Any General Permit involving recycled water for irrigation purposes will need to address major areas of concern.
4. Reporting requirements. Recycled water users currently operating under a wastewater or Master Water Reclamation Permit are required to report specific information to the regional water quality control boards. To document recycled water use, etc., reporting requirements should be specified stating what is to be reported, to whom, and how often.
5. Eligible to apply. The General Permit should clearly state who is eligible to apply. Can private individuals, agencies, cities, etc. apply?
6. Procedures to switch. If individuals, agencies, cities, etc. are currently operating under a recycled water discharge permit issued to the supplier by a regional water board, the General Permit should identify the procedures and approvals necessary to "op out" from the current discharge requirement(s) to change to a General Permit.
7. Administrative issues. Notifications to, and acknowledgments from the regional water boards and the Department of Public Health need to be developed and implemented for administrative, informational, and feedback purposes regarding entities applying for a General Permit that currently do not operate under a recycled water discharge permit.